

Jackie Swigart
SECRETARY



John Y. Brown, Jr.
GOVERNOR

Site:	A. L. Taylor
Break:	10/10
Other:	

COMMONWEALTH OF KENTUCKY
DEPARTMENT FOR NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION
BUREAU OF ENVIRONMENTAL PROTECTION

Jack A. Wilson
COMMISSIONER
FRANKFORT, KENTUCKY 40601

March 24, 1980

Mr. Jim Scarbrough
Region IV
Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30308

Dear Jim:

Members of the Divisions of Hazardous Material and Waste Management, Water Quality, Air Pollution Control, and I met with Reliance Universal and their proposed contractor, CECOS INTL, INC., and viewed the A. L. Taylor site on March 19, 1980. Reliance subsequently provided us with the attached letter. Subject to certain provisions which were part of our discussions, I tend to believe that their proposal is approvable by this department. I expect to respond to them by the first week of April. I will be in Atlanta on March 26 and would be happy to give you the current status on these matters at that time.

Sincerely,

Handwritten signature of Jack A. Wilson in cursive script.
Jack A. Wilson
Commissioner

JW:jz

Attachment

cc: Mike Newton
Office of General Counsel



10951301

000239

RELIANCE UNIVERSAL INC.

CORPORATE OFFICES - SUITE 1600 WATTERSON TOWERS - 1930 BISHOP LANE

LOUISVILLE, KENTUCKY 40218 - TELEPHONE 502/459-9110

WILLIAM J. RUTLEDGE

VICE PRESIDENT - CORPORATE OPERATIONAL STAFF

March 18, 1980

Mr. Jack A. Wilson
Kentucky Department for Natural Resources
and Environmental Protection
Capital Plaza Towers, 5th Floor
Frankfort, Kentucky 40601

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MAR 20 1980

DEPT. ENT. FOR NATURAL RESOURCES
AND ENVIRONMENTAL PROTECTION
COMMISSIONER'S OFFICE

Dear Jack:

This letter is to confirm our discussion of March 6, 1980, regarding the Department for Natural Resources and Environmental Protection's request of Reliance Universal Inc. for assistance in the clean-up plan at the Taylor site in Bullitt County.

We pointed out to you during our meeting that our Company has engaged in no illegal waste disposal activity and is not responsible for the situation at the Taylor site. Furthermore, Reliance sells its products to a wide variety of customers in drums, and these drums may be utilized by those customers, drum washers, solvent reclaimers, and others for whatever purpose they see fit, including waste disposal.

An inventory of drums at the Taylor site by Reliance Universal and DNREP personnel discloses that there is a total of 805 drums bearing Reliance markings which, in one way or another, have found their way to the Taylor site. Reliance has obtained a quotation from CECOS International, Inc. for drum removal under the procedure set forth in the attached proposal. Provided the Department promptly gives approval, Reliance is willing to contract with CECOS for the removal of the 805 drums in accordance with its quotation on the following understandings and conditions:

1. This is voluntary assistance toward the solution of a public problem, and is not to be regarded

Mr. Jack A. Wilson
Kentucky Department for Natural Resources
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as indicating responsibility on the part of Reliance for the situation which exists.

2. The Department will grant unconditional approval for removal of the drums by CECOS in accordance with the attached proposal.
3. There is always the possibility, due to the wide variety of use of Reliance drums by others, that some of the 805 drums may be determined from analysis to contain toxic waste foreign to Reliance's manufacturing operations such as, but not limited to, benzene, chlorinated solvents, PCB and insecticides. Whether or not any such drums are removed under the proposal will remain a matter for determination by Reliance.

It is proposed that Reliance personnel monitor the process of removal and participation by DNREP is invited.

In view of the indefinite duration of the CECOS quotation, your prompt response will be appreciated.

Yours very truly,

RELIANCE UNIVERSAL INC.



William J. Rutledge
Vice President
Corporate Operational Staff

WJR:paf
Attachment

CECOS INTL, INC.
Chemical and Environmental Conservation Systems

309 Montgomery Road
Cincinnati, OH 45242
(513) 793-9226
(513) 681-5730

Formerly NEWCO Chemical Waste Systems

March 18, 1980

Reliance Universal
Suite 1600
Watterson Towers
1930 Bishop Lane
Louisville, Kentucky 40218

Attn: Mr. Paul Brooks

Dear Mr. Brooks,

The following are the operation procedures which will be adhered to concerning analysis, removal, transportation and disposal of materials in drums sitting on the Taylor site in Bullitt County, Kentucky.

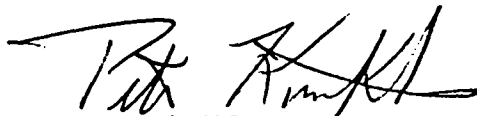
- I. Analysis of Solids - With the assistance of a Reliance Universal technical person knowledgeable of the chemical wastes constituency, CECOS will take stratified samples of a sufficient number of solid drums, composite these samples, and test this representative sample for chemical composition. This analysis will function as the characterization of the waste.
- II. Segregation of Reliance Drums - The solid and semi-solid drums selected for disposal will be moved to a designated staging area with a front end loader. Reliance Universal personnel will point out these marked drums to CECOS. Due care will be exercised in movement of the drums, but it is recognized that adjacent drums could be damaged. In such instances, common sense judgement will be made by the on-site coordinators as to the disposition of such drums. Drums containing liquids destined for thermal oxidation (incineration) will be isolated at another staging area.
- III. Solids Staging - As the drums may not meet Department of Transportation standards, the tops or bungs of the drums will be removed and the drums crushed within a bermed area to be prepared by CECOS. Any liquids in these drums will be absorbed with lime. The earth which becomes contaminated by this action will be removed for disposal.

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INTL, INC.
Chemical and Environmental Conservation Systems

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- IV. Solids Transportation and Secure Disposal - The bulk chemical waste material, the crushed drums and lime will be loaded via a front end loader into a sealed dump trailer. The sealed dump trailer will have adjoining rubber gaskets and the tailgate area will be clamped to insure a water tight seal. A tarp will be latched over the top of the trailer bed to encapsulate the load. This material will be manifested to the CECOS secured chemical vault at 5092 Aber Road, Williamsburg, Ohio 45176. This chemical cell meets or exceeds all proposed Resource Conservation and Recovery Act requirements. Transportation will be subcontracted by CECOS to a fully licensed and qualified hauler.
- V. Liquids, Segregation, Transportation and Disposal - Each liquid drum will be tested in place for chlorinated liquid. Any drum found to have contaminated chlorinated liquid will not be moved. The drums containing non-chlorinated liquid will be segregated in a separate area from solids. Any liquid which cannot be incinerated will be solidified with lime and taken to the secure landfill. A vacuum truck will be used to pump liquids for incineration into a tanker. From the tanker a sample will be drawn and analyzed for % composition, % solid, BTU value, flash point, and % organo chlorine (if necessary). These liquids will be manifested to the nearest capable incinerator. The empty drums and any sludges remaining therein, will be crushed with the solid drums. Here again, any earth contaminated in this process will be secured at the Williamsburg facility.

Sincerely,
CECOS INTERNATIONAL, INC.



Pete Kinikles
Technical Sales Representative

PK/cmh